REMARKS

This Amendment modifies the Request for Continued Examination (RCE) filed herewith.

Applicants appreciate the Office's review of the present application. In response to the Office Action, the cited references have been reviewed, and the rejections and objections made to the claims by the Examiner have been considered. The claims presently on file in the present application are believed to be patentably distinguishable over the cited references, and therefore allowance of these claims is earnestly solicited.

In order to render the claims more clear and definite, and to emphasize the patentable novelty thereof, claims 1-2, 10-16, and 21-22 have been amended, claims 3-9 and 23 have been cancelled without prejudice, and new claims 24-31 have been added. Support for any new claims is found in the specification, claims, and drawings as originally filed, and no new matter has been added. Accordingly, all claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested.

Rejections

Rejection Under 35USC § 102

Claims 1-2, 12-13, 15-16, and 21 have been rejected under 35 USC § 102(b), as being anticipated by "Internationalizing the Sample Program", Anonymous, version from 10/3/1999 ("Internationalizing"). Applicants respectfully traverse the rejection and request reconsideration based on the amendment to claims 1-2, 12-13, 15-16 and 21 and features in the other claims which are neither disclosed nor suggested in the cited reference.

As to a rejection under 102, "[a]nticipation is established only when a single prior art reference discloses expressly or under the principles of inherence, each and every element of the claimed invention." *RCA Corp. v. Applied Digital Data Systems, Inc., (1984, CAFC) 221 U.S.P.Q. 385.* The standard for lack of novelty, that is for "anticipation," is one of strict identity.

To anticipate a claim, a patent or a single prior art reference must contain all of the essential elements of the particular claims. _Schroeder v. Owens-Corning Fiberglass Corp., 514 F.2d 901, 185 U.S.P.Q. 723 (9th Cir. 1975); and Cool-Fin Elecs. Corp. v. International Elec. Research Corp., 491 F.2d 660, 180 U.S.P.Q. 481 (9th Cir. 1974)._ The identical invention must be shown in as complete detail as is contained in the claim. _Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)._ The elements must be arranged as required by the claim. _In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)._

Independent claim 1 (amended), and its dependent claim 2, are patentably distinguishable over the cited reference because claim 1 emphasizes the novel features of the present invention in which language-localized text strings corresponding to text messages of a file are retrieved according to only a string identifier and a language identifier, the file being processable by a web browser and having the same URL regardless of the language. In this regard, claim 1 recites:

"1. (Currently amended) A device for providing text messages of a file in multiple languages, comprising:

a message catalog configured to store a plurality of localized text strings, each localized text string uniquely identified by only a string identifier and a language identifier;

a localized string retrieval function configured to retrieve from the message catalog a particular one of the localized text strings according to <u>only the string identifier and the language identifier;</u>

<u>a file processable by a web browser to display, in a selected one of the multiple languages, the text messages included in the file, wherein the file does not include the localized text strings corresponding to the text messages, the file having a URL that is the same for any of the multiple languages;</u> and

a web server configured to provide the file to the web browser, the web browser configured to display a particular one of the text messages in the selected language by executing the localized string retrieval function corresponding to the particular text message so as to obtain the text in the selected language." (emphasis added)

The Internationalizing reference discloses a localization system in which text strings are retrieved according to a Key (i.e. a string identifier) and a Locale. As is described in the Internationalizing reference:

"The Locale object identifies <u>a particular language and country</u>. The following statement defines a Locale for which the language is English and the country is the United States:

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aLocale = new Locale("en","US");
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The next example creates Locale objects for the French language in Canada and in France:

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caLocale = new Locale("fr","CA");
frLocale = new Locale("fr","FR");" (p.2; emphasis added)
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Significantly, the Internationalizing reference utilizes a language code (e.g. "fr") and a country code (e.g. "CA"), and the language and country codes follow MessagesBundle in the names of the properties files (e.g. "MessagesBundle_en_US.properties", "MessagesBundle_fr_FR.properties", and "MessagesBundle_de_DE.properties") (p.2.). This is different from the device recited in amended claim 1 which includes the limitation of "a localized string retrieval function configured to retrieve from the message catalog a particular one of the localized text strings according to <u>only</u> the string identifier and the language identifier". This differentiates the claimed device from the Internationalizing reference in that only two items of information are required, rather than three.

In addition, claim 1 has been extensively amended to recites other limitations that further distinguish over the Internationalizing reference. For example, the Internationalizing reference does not disclose a device that includes a web server, nor a file provided by the web server to a web browser in which text messages of the file are displayed in a selected language, where the file has the same URL regardless of the selected language in which the text messages are displayed by the web browser.

The novel features of the present invention are not anticipated by the Internationalizing reference in that these essential elements are absent from the reference. Therefore, the rejection is improper at least for these reasons and should be withdrawn.

Independent claims 12 and 21 (both currently amended) each recite limitations similar to those of claim 1, discussed above.

Claim 12 recites:

"12. (Currently amended) A method for providing a file including text messages displayable in multiple languages using a device linked to a message catalog having a plurality of localized strings corresponding to the text messages, wherein each localized string is defined by a string identifier that uniquely identifies each text message in the file and a language identifier that uniquely identifies each language in which the localized strings are available, comprising:

requesting a file using a web browser, the file having a URL that is the same for any of the multiple languages;

identifying a predetermined language;

contacting the message catalog with a particular string identifier and the predetermined language to retrieve a particular localized string corresponding to a particular one of the text messages; and,

uniquely determining the particular localized string at the message catalog using only the particular string identifier and the predetermined language." (emphasis added)

Claim 21 recites:

"21. (Currently amended) A system for providing a file including text messages displayable in multiple languages using a device linked to a message catalog having a plurality of localized strings corresponding to the text messages, wherein each localized string is defined by a string identifier that uniquely identifies each text message in the file and a language identifier that uniquely identifies each language in which the localized strings are available, comprising:

means for requesting a file using a web browser, the file having a URL that is the same for any of the multiple languages;

means for identifying a predetermined language;

means for contacting the message catalog with a particular string identifier and the predetermined language to retrieve a particular localized string corresponding to a particular one of the text messages; and,

means for uniquely determining the particular localized string at the message catalog using only the particular string identifier and the predetermined language." (emphasis added)

For similar reasons as explained heretofore with regard to claim 1, the novel features of the present invention are not anticipated by the Internationalizing reference. The essential element of uniquely determining the localized string at the message catalog using only the particular string identifier and the predetermined language is absent from the Internationalizing reference. In addition, the essential element of a web browser-accessible file that includes text messages displayable in multiple languages and has a URL that is the same for any of the languages is absent from the Internationalizing reference. Therefore, the rejection of independent

claims 12 and 21, and dependent claims 13 and 15-16, is improper at least for these reasons and should be withdrawn.

Rejection Under 35USC § 103

Claim 22 has been rejected under 35 USC § 103(a), as being unpatentable over "Internationalizing the Sample Program", Anonymous, version from 10/3/1999 ("Internationalizing") in view of U.S. patent 6,311,151 to Yamamoto et al. ("Yamamoto"). Applicants respectfully traverse the rejection and request reconsideration based on the amendment to claim 22 and features in the claim which are neither disclosed nor suggested in the cited references, taken either alone or in combination.

As to a rejection under 103(a), the U.S. Patent and Trademark Office ("USPTO") has the burden under § 103 to establish a *prima facie* case of obviousness by showing some objective teaching in the prior art or generally available knowledge of one of ordinary skill in the art that would lead that individual to the claimed invention. *See In re Fine, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988)*. The Manual of Patent Examining Procedure (MPEP) section 2143 discusses the requirements of a *prima facie* case for obviousness. That section provides as follows:

> To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and reasonable expectation of success must be found in the prior art, and not based on applicant's disclosure.

Independent claim 22 is patentably distinguishable over the cited references because claim 22 emphasizes the novel features of the present invention in which language-localized text

strings corresponding to text messages of a file are retrieved according to only a string identifier and a language, the file being displayable by a web browser in multiple languages and having the same URL regardless of the language. In this regard, claim 22 recites:

"22. (Currently amended) A computer program product comprising a computer usable medium having computer readable program codes embodied in the medium that when executed causes a computer to:
request a file using a web browser, the file displayable in multiple languages using a device linked to a message catalog having a plurality of localized strings corresponding to the text messages, wherein each localized string is defined by a string identifier that uniquely identifies each text message in the file and a language identifier that uniquely identifies each language in which the localized strings are available, the file having a URL that is the same for any of the multiple languages;
identify a predetermined language;
contact the message catalog with a particular string identifier and the predetermined language to retrieve a particular localized string corresponding to a particular one of the text messages; and,
uniquely determine the particular localized string at the message catalog using only the particular string identifier and the predetermined language." (emphasis added)

As explained heretofore with reference to claim 1, the limitations of a web browser accessible file that is displayable in multiple languages and that has a URL that is the same for any of the multiple language, and of uniquely determining a particular localized string at the message catalog using only a particular string identifier and a predetermined language, are neither taught nor suggested by the Internationalizing reference.

Nor does the Yamamoto reference teach or suggest such limitations. The Yamamoto reference describes storing contextual information in localization files along with the text to be translated, in order to reduce or eliminate verification testing of the translated text (Abstract). The Yamamoto reference is cited by the Office only for teaching method storage on a computer readable medium. The Yamamoto reference teaches or suggests nothing about a web browser accessible file that is displayable in multiple languages and that has a URL that is the same for any of the multiple language, or about uniquely determining a particular localized string at a message catalog using only a particular string identifier and a predetermined language.

The features of the present invention are neither disclosed nor suggested by the Internationalizing reference in combination with the Yamamoto reference. Applicants respectfully traverse the Office's assertion that it would have been obvious to a person of ordinary skill in the art at the time the invention was made to include the claimed features of Applicants' invention. Such could be possible only in hindsight and in light of Applicants' teachings. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Claims 10, 11, and 17-19 have been rejected under 35 USC § 103(a), as being unpatentable over "Internationalizing the Sample Program", Anonymous, version from 10/3/1999 ("Internationalizing") in view of U.S. patent 6,453,339 to Schultz et al. ("Schultz "). Applicants respectfully traverse the rejection and request reconsideration based on the dependence of these claims on one of independent claims 1 and 12, whose reasons for allowability over the Internationalizing reference have been discussed heretofore and against which the Schultz reference has not been cited.

Claims 14 and 20 have been rejected under 35 USC § 103(a), as being unpatentable over "Internationalizing the Sample Program", Anonymous, version from 10/3/1999 ("Internationalizing"). Applicants respectfully traverse the rejection and request reconsideration based on the dependence of these claims on independent claim 12, whose reasons for allowability over the Internationalizing reference have been discussed heretofore.

Conclusion

Attorney for Applicant(s) has carefully reviewed each one of the cited references made of record and not relied upon, and believes that the claims presently on file in the subject application patentably distinguish thereover, either taken alone or in combination with one another.

Therefore, all claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested. If it is felt for any reason that direct communication with Applicant's attorney would serve to advance prosecution of this case to finality, the Examiner is invited to call the undersigned Robert C. Sismilich, Esq. at the below-listed telephone number.

AUTHORIZATION TO PAY AND PETITION
FOR THE ACCEPTANCE OF ANY NECESSARY FEES

If any charges or fees must be paid in connection with the foregoing communication (including but not limited to the payment of an extension fee or issue fees), or if any overpayment is to be refunded in connection with the above-identified application, any such charges or fees, or any such overpayment, may be respectively paid out of, or into, the Deposit Account No. 08-2025 of Hewlett-Packard Company. If any such payment also requires Petition or Extension Request, please construe this authorization to pay as the necessary Petition or Request which is required to accompany the payment.

Respectfully submitted,

Robert C. Sismilich
Reg. No. 41,314
Attorney for Applicant(s)
Telephone: (858) 547-9803

Date: 4/1/06

Hewlett-Packard Company
Intellectual Property Administration
P. O. Box 272400
Fort Collins, CO 80527-2400